

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHAWN CAREY, MSS CAPITAL, LLC,  
HUNTS ROAD, LLC, ION1 LLC,  
BRICKELL CAPITAL SOLO 401K TRUST,  
KAILEY LEWIS, EDWARD REINLE,  
EMANUEL VALADAKIS and ZITAH  
MCMILLAN-WARD, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL MOE, PETER B. RITZ, LZG  
INTERNATIONAL, INC., ROGER  
HAMILTON, and GENIUS GROUP  
LIMITED,

Defendants.

Case No. 1:24-cv-07551

**DECLARATION OF BERNARDO N. M. FRANCO IN SUPPORT OF THE MOTION TO  
DESIGNATE GROUP OF PLAINTIFFS AS LEAD PLAINTIFF AND APPROVE AXS  
LAW, PLLC AS LEAD COUNSEL**

I, Bernardo N. M. Franco, declare as follows:

1. I am a member in good standing of the bars of the State of New York and of this Court, and a litigation attorney at AXS Law Group, PLLC (“AXS Law”).

2. I submit this declaration in support of the Motion filed by Plaintiffs, Shawn Carey, Hunts Road, LLC, Ion1 LLC, Brickell Capital Solo 401k Trust, Kailey Lewis, Edward Reinle, Emanuel Valadakis, and Zitah Mcmillan-Ward (together, the “Group”), for: (1) appointment of Group as Lead Plaintiff; (2) approval of the Group’s selection of AXS Law to serve as Lead Counsel for the Class; and (3) any such further relief as the Court may deem just and proper.

3. Attached as Exhibits A through C are true and correct copies of the following

documents:

**EXHIBIT A** Notice of pendency of *Shawn Carey et al v. Michael Moe et al*, Case No. 1:24-cv-07551, published on October 25, 2024.

**EXHIBIT B** Plaintiffs' Certifications.

**EXHIBIT C** Firm Resume of AXS Law.

Executed this 26th day of December, 2024.

/s/ Bernardo N. M. Franco  
Bernardo N. M. Franco